



My Generation Energy
Michael Stone, Policy & Regulations Manager
508 – 566 – 6322
www.MyGenerationEnergy.com

August 15th, 2011

Natalie Andrews
Department of Energy Resources
100 Cambridge St. Suite 1020
Boston, MA 02114

RE: 225 CMR 14.00
Proposed Forward Schedule of the Solar Carve-Out

Dear Natalie Andrews:

My Generation Energy, Inc. submits these comments on the Massachusetts Department of Energy Resources Proposed Forward Schedule of the Solar Carve-Out.

As an installer and developer of photovoltaic systems we believe the Proposed Forward Schedule is an equitable method of both achieving robust solar industry growth in Massachusetts while compensating system owners for the associated development, financing, and market risks these projects entail. By giving long-term visibility in this manner, the significant capital investments our company and the industry makes will be approached with more clarity; and past capital investments, made in more uncertain times, will be honored.

Therefore we believe a 5% ACP Rate reduction after Compliance year 2013 is reasonable and is in line with other state SREC programs. This reduction rate also represents a healthy moderation relative to the dramatic 10% reductions the industry was susceptible to before the DOER Proposed Forward Schedule.

At the same time we believe the Department should fully consider maintaining the option to raise the ACP Rate upwards in later years to ensure a fair economic result in the face of unanticipated market conditions. Possible conditions could include the loss of the Investment Tax Credit beyond 2016, multi-year periods of flat or falling electricity prices, a potential deceleration, or rise, in system installed cost, as well as a range of other unforeseen market factors.

My Generation Energy appreciates the opportunity to provide these comments and strongly supports the continued development of solar generation in the Commonwealth.

Very truly yours,

Michael T. Stone,
Policy & Regulations Manager
My Generation Energy, Inc.